

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION**

IN RE:

**SARAH BAXTER HILL,

DEBTOR**

**CASE NO. 23-03502-5-PWM
CHAPTER 13**

DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM STAY

NOW COMES the Debtor, by and through undersigned counsel, and responds to the Motion for Relief from Stay (Doc 23) filed by U.S. Bank Trust, N.A., as Trustee of the SCIG Series III Trust, serviced by SN Servicing Corporation (hereinafter "creditor") on December 30, 2024 and shows the following:

1. The Debtor disputes certain factual allegations in the Motion regarding her interactions with agents of the creditor.
2. Nonetheless, the Debtor does not oppose the creditor's ability to apply the insurance proceeds to its secured claim in order to pay the claim in full and have the deed of trust against the real property satisfied and marked as such on the public record.
3. From her own funds the Debtor has paid for a general contractor named Anthony Brooks to perform certain repairs at the real property. As such, the Debtor believes she should receive the surplus insurance proceeds.
4. The Debtor's Chapter 13 Plan is a 100% payout to general unsecured creditors, and she intends to finish out the Plan even after this creditor's claim is paid in full.

WHEREFORE, the Debtor prays the Court that the creditor's motion be denied as stated, that a hearing be set in this matter, and for such other and further relief as the Court deems just and proper.

Dated: January 10, 2025.

/s/ Travis Sasser
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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Response to Motion for Relief from Stay is to be served on the entities listed below at their last known address with sufficient postage thereon, or, if such interested party is an electronic filing user, by serving such interested party by electronic transmission, pursuant to Local Rule 5005-4(9)(b).

Chapter 13 Trustee
Served Electronically

SN Servicing Corporation
Attn: Managing Agent
c/o John W. Fletcher, III, Esq.
Served Electronically

Harry J. Hill
4504 Creekside Drive
Killeen, TX 76543

Sarah Hill
Served Electronically

Dated: January 10, 2025.

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